SNR Denton US LLP 1301 K Street, NW 600. East You aton, BC 20006-3964 USA D+1 202 408 6477

Michael E. Zolandz D +1 202 408 9294

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December 7, 2010

#### BY HAND DELIVERY

### **CONFIDENTIAL SUBMISSION**

Jeff S. Jordan Supervisory Attorney Complaints Exemination & Legal Administration Federal Eletidan Commission 999 E Street, NW Washington, PC 20463

EC MAIL CENTER

DEC -7 PM 4: 34

MUR 5401 and MUR 6432 Re:

Response of TransCanada Keystone Pipeline GP, LLC

Dear Mr. Jordan:

This response is submitted by undersigned counsel on behalf of TransCanada Keystone Pipeline GP. LLC ("Keysthas") in reply to complaints filed by the Nebraska Democratic Party (MUR 6401) and Bold Nebraska (MUR 6432). As more fully detailed below. TransCanada requests that the Commission find no reason to believe that a vielation of the Federal Election Campaign Act ("FECA") accurred in these matters, and dismiss the Complaint accordingly. Because of the nature of certain company proprietary information contained in this submission, Keystone also requests that this submission remain confidential pursuant to 2 U.S.C. §§ 437g(a)(4)(B) and 437g(a)(12)(A), and 11 C.F.R. §§ 4.5(a) and 111.21.

The complicit filed by Nebratur Danwordt Party massin Stat the Resiters malic a cultribillion to the Guranner Hummuran Committee in sintation of a U.S.C. Sel-41e. The complaint coestitues why the addesan word on the contributions report flied by the Gorentor Heinessen Committee is not the Oreska, Nebraska business address of Keystone, but rather discloses the address of "the Canadian corporate headquarters of TransCanada Energy, Ltd." Similarly, the complaint filed by Bold Nebraska asserts that TransCanada Corporation made contributions to the Governor Heineman Committee and the Bruning for Attorney General campaign in violation of 2 U.S.C. §441e.

As more fully detailed below, while the issue of the reported entity or address of the contributor may have resulted in some uncertainty as to the permissibility of the contributions, at no time was a foreign national involved in the mailting of these contributions, and the assertions with respect to the source of the contributions or intimation of involvement of a foreign national in the direction or caritrol & the contributions are incorrect.

Further, despite the contributions being made by a US entity, from US funds, and under the direction and coming of US citizens, we analogue that the sentusion religing to omity identification and address and the General sumpaigns to fully refund the contributions in quastica as September 20, 2010, pinor to the filing on October 16, 2010 and October 19, 2010<sup>1</sup> respectively of the instant complaints.

## **Cverview of Keystone**

TransCanada Reystone Plautine GP, LP is a US entity incorporated in Delaware with its principal place of business located at 717 Texas St, Suite 2400, Houston, Texas, and with operations at 13710 FNB Parkway, Omahu, Networks. Keystone appeares as a subdiviney of TransCanada Pipeins USA, Ltd, also a US composition registered in Delaware. Both entities are whelly covered by TransCanada Corporation. An appearational short is concluded at Exhibit A.

As the Commission is aware from its approval of Advisory Opinion 2006-15, TransCanada operates through multiple US subsidiaries. TransCanada has developed a set of internal practices and policies to ensure that its political activities in the US fully comply with FECA and Commission regulations. As with other political contributions made by US subsidiaries of TransCanada, the contribution to the Governor Heinerman Committee was directed and controlled by US critzens using US collars from bank accounts in the US that are uniter the control of Kurystone.

## Contribution Summary

On December 11, 2009, Beth Jensen, Director of Government Relations for Keystone and a US citizen, approved and directed disbursement of contributions in the amount of \$2,500 each to the Governor Heineman Committee and the Bruning for Attorney General campaigns. This approval was given only after Ms. Jensen reviewed both the permissibility of the contribution under Nebraska law and attendant reporting obligations with outside counsel.

Transitionands shows unto Papalista simil presess the request and learne of the Kayletters controlling functs to the Heimman and Brutaing campaigns. Assessed the request as directed, and on December 22, 2009, checks payable from "TransCanada Keystone Pipeline, LP" were issued on a Kaystone US funds Citilogic secount. As directed, Accounts Payable sent the checks to Me. Jansen. The Accounts Payable center does not authorize payments, but is only permitted to process those payments duly authorized by operating units of TransCanada — in this case, Keystone. Upon receipt of the checks from Accounts Payable, Ms. Jensen forwarded the contribution checks to Kissel E&S Associates, also located in Omaha, Nebraska, an outside consulting firm engaged by Keystone for government relations efforts. The consulting firm then delivered the checks by fland to the campidate committees. Accopy of the checks to the Heineman and Bruning campaign committees are engaged as Exhibit C.

Two issues arose with respect to the importing of these contributions,

<sup>&</sup>lt;sup>1</sup> Bold Nebraska initially filed its complaint on October 19, 2010, but the complaint was technically deficient. It was refiled on November 5, 2010.

First, as directed by Ms. Jensen and as noted on the contribution checks, the contributor is identified as Keystenia. The address listed on the sheeter, harraner, is neather Counte, Michaeska business of Keystone, but without the address of the Calgary Assonats Payable center that prepared the checks at Ms. Jensen's instruction. Contany to the assettions made in the complaints, this address in no way denotes that the checks originated from a foreign source, but identifies only the location of the Accounts Payable center. The checks plainly identify the US bank on which the funds were drawn, and clearly state "US Funds" on the face of the checks. As directed by Ms. Jensen, and consistent with Commission guidance to TransCanada in AO-2006-15, the contribution was made from US dollar denominated operating funds of Keystone located in a US financial institution.

Second, in repeating theme contributions on Jamony 29, 2010 to the Meinteke Anegoticity and Disclosure Commission ("NADC"), Keystone personnel incorrectly Identified "TransCanada Corporation" as the named contributor, cather than Kaystone. However, the Form 8-7 Wing properly disclosed the Omaha, Nebraeka operating address for Keystone. A copy of the NADG Form 8-7 as filed is eaclosed as Exhibit D, and a copy of an amended filing is included as Exhibit E.

Neither of these issues after the essential character of the contributions as ones directed by US persons, them on US financial institutions, and using US funds of Keystone.

It is our multimental titrit in number of contributions compared by the Halamenton and Emminy compared committees as a result of an impulsy from the NADC id September 2018 identified uncertainty regarding the source of the contribution on the checks. Despite receiving clarifying information from Keystone, out of an abundance of caution the two candidate campaittees estimated the contributions to Keystone on September 29, 2010, and a copy of the refund checks are enclased as Exhibit F.

#### Legai Framework

PECA and Communical regulations profitally foreign nationals from making, attently or indirectly, contributions or expenditures in connection with federal, state, or local elections. 2 U.S.C.§ 441e. This includes any foreign material participation in the decision-making process or control of the political contribution activities of domestic subsidiary corporations. 11 C.F.R.§ 110.20(i). See also Advisory Opinions 2000-17 (Esternismum), 1996-15 (Alikam Englan PAC), 2008-15 (TransCanada). The province of the positional process by individuals and artifical net under the jurisdiation and control of the laws of the United States.

Compliance with this framework has been a central aspect of TransCanada's US operations, and is an obligation taken seriously by TransCanada's US subsidiaries, including Keystone. Indeed, TransCanada, through counsel, requested and received an Advisory Opinion (AO 2006-15) from the Commission with respect to its proposed internal centrols related to political activities by its US subsidiaries. The AO request was on behalf of TransCanada and two of its US subsidiaries, Gas Transmission Northwest Corporation ("GTN") and TransCanada hydrough Machinest inc. ("TC Hydro"). As definited coord, and consistent with galdasce received from the Canadianian, its contributions at issue in these matters were not made by a fereign entity, nor stid any feeting individual or antity direct, control, or participate in the decision making process regarding the making of the contributions by Keystens.

Under existing Commission precedent, providing administrative support that is de minimis does not result in facilitation of a political contribution. 2 U.S.C. § 441b(b)(2)(C), see alice Advisory Opinions 1978-27 (Committee for Thorough Agricultarial Political Education) and 1978-42 (South Carolina National MS. Bank PAC). In the context of political action committees ("PACs") formed by US comperations either wholly owned by, or subsidiaries of, foreign corporations, the Commission has permitted the foreign entity to provide administrative support to the subsidiary's PAC without running afoul of the prohibition on foreign participation in US elections, provided no foreign nationals participate in the decision making process regarding contributions. See Advisory Opinions 1982-34 (Sonat), 1983-11 (Portland Commit—Association), and 2009-14 (Mercettee-Benz USA/Sterling). Such de retininals involvement, in this instance the use of a payment processing facility for an approved distribution ment as directed by a US citizen, would be consisted with east Commission guidance.

### Existing and Future Compliance Measures

Consistent with Commission guidance, TransCanada's US subsidiaries utilize an existing set of procedures to ensure that only US citizens or permanent residents are involved in the decision making and approval process for individual political contributions, and that only US operating funds are used for those contributions.

Given the confusion contributions the contributions in question, Transcarda's US unbeliables have excipted two marifications to current processes. First, approval and reporting of any US political contribution by any US subsidiary, including Keystone, will be centralized through TransCanada Pipeline US, Ltd. Second; all future US political contributions will be properted through one of its two US processing centers. Contributions will continue to be directed by US persons, down on US financial institutions, and using US funds as has been the pattern and practice for contributions to date. This approach will further facilitate of the use of processes and procedures that have already been vetted and approved by the Commission.

Those updated procedures will be integrated with TransConada's training protocols for executives and government relations attiff at each US operating entity sturing the next training cycle.

#### Conclusion

The FECA prohibits a foreign national from directly or Indirectly making a contribution or donation of money in connection with a federal, state, or local election. Foreign nationals shall not direct, dictate, control, or directly or indirectly participate in the decision making process of any person, such as a corporation, with regard to such person's federal or non-federal election-related activities. Contrary to the assertions raised in the two complaints, no impermissible foreign national contributions occurred in these matters. Moreover, given the return of the contributions by recipient committees on its own initiative, and the commitment by TransCanada to implement additional steps to avoid future misunderstandings with respect to the political activities of its US subioidiavies, further action in these mutters is not warranted.

## SNR DENTON I

Response in MUR 6401 and MUR 6432 December 7, 2010 Page 5

Respondents, through counsel, respectfully request that the Commission find no reason to believe that a violation of FECA occurred in this matter, and dismiss the instant complaint.

Sincerely,

JAR

**SNR Denton US LLP** 

By:

Mike McNamara Michael E. Zolandz

Counsel for TransCanada Keystone Pipeline GP, LLC

1044300116

**Enclosure** 

NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION 11<sup>th</sup> Floor, State Capitol P.O. Box 95086 Lincoln, NE 88509 (402) 471-2522

BEFORE COMPLETING THIS FORM READ THE INSTRUCTIONS ON PAGE 3

## REPORT OF POLITICAL CONTRIBUTIONS OF A CORPORATION, UNION EHER ASSOCIATION NADC FORM B-7

POSTMARK DATE MICROFILM NUMBER OFFICE USE ONLY RECEIVED LINCOLY, NEBRASKA 2010 FEB - 1 PM 2: 29 NE. AGGISLOGI, CITY & NECESSIONE COMPRESSION

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BEFORE COMPLETING THIS FORM READ THE INSTRUCTIONS ON PAGE 3

## REPORT OF POLITICAL **CONTRIBUTIONS OF A** PORATION, UNION HER ASSOCIATION DÖ FÖRM B-7

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TransCanada Keystone, LP 13710 FNB Parkusy #219 Omaha, NE 65154

Both Jensen Director, Government Relations both\_jensen@transsacads.com 402-492-3400

November 30, 2010

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**BY FedEx** 

**Enclosures** 

Nebraska Accountability-arid Disclosure-Commission 11th Floor, State Capital Post Office Box 95086 Lincoln, Nebraska 68509 (402) 471-2522

Re: Amended NADC Form B-7

To Whom It May Condern:

On behalf of TransCariada Keystone, LP, we are amending two previously-filed Nebraska Accountability and Disclosure Commission Reports of Political Contributions of a Corporation, Union or Other Association (NADC Form B-7). The amendment to both NADC Form B-7s clarify the name of the corporation. Specifically, "TransCanada Corporation" should be replaced with "TransCanada Keystone, LP" on both NADC Form B-7s.

Enclosed with this letter are the two original NADC Form B-7s and the appropriate amended form. Each amended NADC Form B-7 is marked with a large red arrow pointing to the one change outlined above.

Should you have any questions about the enclosed amended forms, please let me know.

Sincerely,

Beth Jensen

Response to MUR 6401 and MUR 6432 Exhibit E -1

## NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION 11<sup>th</sup> Floor, State Capitol P.O. Box 95086 Lincoln, NE 68509 (402) 471-2522

BEFORE COMPLETING THIS FORM READ THE INSTRUCTIONS ON PAGE 3

# REPORT OF POLITICAL CONTRIBUTIONS OF A CORPORATION, UNION OR OTHER ASSOCIATION NADC FORM B-7

POSTMARK DATE	
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- Any corporation (including a non-profit or professional corporation), labor organization, or industry, trade, or professional

   association, doing business in this state which makes a contribution or expenditure or provides personal services of mere than
   \$250 as determined by fair market value for the purposes of influencing or attempting to influence the action of the valers for or
   against the nomination or election of one or more candidates or the qualification, passage or defeat of one or more ballot
   questions must file this form.
- File with the Nettraska Accountability and Disclosure Commission within 10 days after the end of the calendar month in which
  any repertable contribution or expenditure is made or personal services provided.

<ul> <li>any repertable contribution or expenditure is made or personal services provided.</li> <li>This report is filed on time if it is postmarked or received on or before the due date. Late filing fees are \$25 per day, not to exceed \$750.</li> </ul>										
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## NEBRASKA ACCOUNTABILITY AND DISCLOSURE COMMISSION 11<sup>th</sup> Floor, State Capitol P.O. Box 95086 Lincoln, NE 68509 (402) 471-2522

BEFORE COMPLETING THIS FORM READ THE INSTRUCTIONS ON PAGE 3

# REPORT OF POLITICAL CONTRIBUTIONS OF A CORPORATION, UNION OR OTHER ASSOCIATION NADC FORM B-7

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File with the Nethraska Accountability and Disclosure Commission within 10 days after the end of the calendar month in which any reportable contribution or expenditure is made or personal services provided.

This report is filled on tirale if it is postrivarked or received on or before the due date. Late filling fees are \$25 per day, not to exceed \$750.

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